

# SPIVAKLIPTON<sub>LLP</sub>

ATTORNEYS AT LAW

Hope Pordy  
hpordy@spivaklipton.com  
1040 Avenue of the Americas, 20<sup>th</sup> Floor  
New York, NY 10018  
T 212.765.2100  
F 212.765.8954  
spivaklipton.com

February 5, 2024

**VIA ECF**

Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Re: *International Alliance of Theatrical Stage Employees (I.A.T.S.E.), et al v. That's Amore Movie, LLC*, Case No. 23-cv-10731 (JMF)

Dear Judge Furman:

I represent the Plaintiffs – International Alliance of Theatrical Stage Employees (I.A.T.S.E.), Local 600, International Cinematographers Guild, Local 700, Motion Picture Editors Guild, Local 161, Script Supervisors, Production Coordinators, and Accountants, Local 798, Make-Up Artists and Hair Stylists, Local 764, Theatrical Wardrobe Union, Local 52, Motion Picture Studio Mechanics, and United Scenic Artists, Local USA 829 (“collectively referred to herein as “Plaintiffs”) – in the above-referenced lawsuit brought against That’s Amore Movie, LLC (“Defendant” or “That’s Amore”).

On or about January 30, 2024, Your Honor granted Defendant’s Letter Motion to Seal Certain Limited Portions of its Opposition to Plaintiffs’ Petition to Confirm Arbitration Award and Application for Attorneys Fees and Costs [ECF Dkt. Nos. 20 and 23]. On or about December 20, 2023, Your Honor granted Plaintiffs’ Letter Motion to Seal the parties’ Mutual General Release and Settlement Agreement (“Settlement Agreement”), which was fully executed by the parties on August 18, 2023 (“Sealing Order”) [ECF Dkt. Nos. 6 and 10].

Pursuant to the January 30, 2024 Order, the Sealing Order, and Your Honor’s Individual Rule of Practice 7, Plaintiffs request leave to file under seal certain limited portions of its Reply to Defendant’s Opposition to Plaintiffs Petition to Confirm Arbitration Award and Application for Attorneys Fees and Costs and accompanying papers. Plaintiffs seek to quote directly from portions of the Settlement Agreement in support of their Reply and request the Court’s permission to file it under seal given the confidentiality clause contained therein and the Court’s prior Sealing Order.

Hon. Jesse M. Furman

Page 2

Accordingly, Plaintiffs respectfully request that they be permitted to file certain limited portions of their Reply Memorandum of Law, and accompanying papers, under seal in compliance with the confidentiality terms of the Settlement Agreement and consistent with Defendant's request [ECF Dkt. Nos. 20 and 23], and for the reasons stated in Plaintiffs' initial Letter Motion to Seal [ECF Dkt. Nos. 6 and 10].

A proposed order is attached.

Respectfully submitted,

SPIVAK LIPTON LLP

*Attorneys for Plaintiffs International  
Alliance of Theatrical Stage Employees  
(I.A.T.S.E.), Local 600, International  
Cinematographers Guild, Local 700, Motion  
Picture Editors Guild, Local 161, Script  
Supervisors, Production Coordinators, and  
Accountants, Local 798, Make-Up Artists  
and Hair Stylists, Local 764, Theatrical  
Wardrobe Union, Local 52, Motion Picture  
Studio Mechanics, United Scenic Artists,  
Local USA 829*

By:       /s/      

Hope Pordy

1040 Avenue of the Americas, 20th Floor  
New York, NY 10018

(212) 765-2100

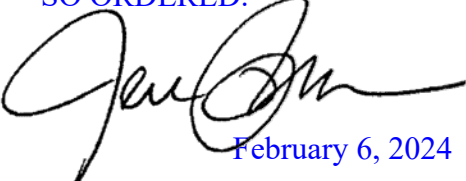
hpordy@spivaklipton.com

Cc: John M. Gatti, Esq.  
Lauren Fried, Esq.  
Loeb & Loeb LLP  
10100 Santa Monica Blvd., Ste 2200  
Los Angeles, CA 90067  
jgatti@loeb.com  
lfried@loeb.com

*Attorneys for Defendant  
That's Amore Movie, LLC*

The motion to seal is granted temporarily. The Court will assess whether to keep the documents at issue sealed or redacted when resolving the underlying dispute. The Clerk of Court is directed to terminate ECF No. 26.

SO ORDERED.



February 6, 2024